

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN  
 FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF  
 ONE HUNDRED FIRST OMNIBUS OBJECTION TO CLAIMS SHOULD  
 REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S)  
 AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION  
 AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE  
 WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
 DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.**

WEIL, GOTSHAL & MANGES LLP  
 767 Fifth Avenue  
 New York, New York 10153  
 Telephone: (212) 310-8000  
 Facsimile: (212) 310-8007  
 Shai Y. Waisman

Attorneys for Debtors  
 and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF HEARING ON DEBTORS' ONE HUNDRED FIRST  
 OMNIBUS OBJECTION TO CLAIMS (SETTLED DERIVATIVE CLAIMS)**

**PLEASE TAKE NOTICE** that on February 14, 2011, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), filed their one hundred first omnibus objection to claims (the "Debtors' One Hundred First Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Debtors' One Hundred First Omnibus Objection to

Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **March 31, 2011 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Debtors' One Hundred First Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Shai Waisman, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than **March 16, 2011 at 4:00 p.m. (Eastern Time)** (the "Response Deadline").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Debtors' One Hundred First Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' One Hundred First Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: February 14, 2011  
New York, New York

/s/ Shai Y. Waisman  
Shai Y. Waisman

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New York, New York 10153  
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Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11 Case No.  
:   
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
:   
Debtors. : (Jointly Administered)  
-----X

**DEBTORS' ONE HUNDRED FIRST OMNIBUS  
OBJECTION TO CLAIMS (SETTLED DERIVATIVE CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE  
CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING  
THIS ONE HUNDRED FIRST OMNIBUS OBJECTION TO CLAIMS  
SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR  
NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS  
OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO  
TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR  
CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors, in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), respectfully represent as follows:

**Relief Requested**

1. The Debtors file this one hundred first omnibus objection to claims (the “One Hundred First Omnibus Objection to Claims”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [Docket No. 6664], seeking to disallow and expunge the claims listed on Exhibit A annexed hereto.

2. The Debtors have examined the proofs of claim identified on Exhibit A and have determined that the proofs of claim listed on Exhibit A (collectively, the “Settled Derivative Claims”) should be disallowed and expunged as contrary to the settlements that the parties have entered into. Pursuant to this Court’s order approving procedures for the settlement or assumption and assignment of prepetition derivative contracts (the “December Order”) [Docket No. 2257], claimants and the Debtors have negotiated settlements of disputes related to derivative claims. These signed agreements provide for resolution of the derivative claims either with a payment to the Debtors or with no amounts being due between the parties. The proofs of claim being objected to are not consistent with such settlements as they seek to recover amounts from the Debtors

based on the prepetition derivative contracts. The Debtors, therefore, request that the Court disallow and expunge the Settled Derivative Claims.

### **Jurisdiction**

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

### **Background**

4. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under title 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On September 17, 2008, the United States Trustee for the Southern District of New York (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

6. On December 16, 2008, the Court entered the December Order, which approved and established specific procedures by which the Debtors could settle claims arising from the termination of prepetition derivative contracts.

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's

appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

**The Settled Derivative Claims Should Be Disallowed and Expunged**

9. In their review of the claims filed on the claims register in these cases, the Debtors have identified the claims on Exhibit A as being claims for which the Debtors specifically negotiated an agreement with the claimants for either a payment to the Debtors or for zero dollars. The Settled Derivative Claims are not consistent with the signed agreements, which provide that the Debtors have no liability under the relevant derivative contracts.

10. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

11. Pursuant to the December Order, the Debtors engaged in negotiations with certain claimants that had filed proofs of claim against the Debtors asserting obligations based on prepetition derivative contracts. The Debtors and these

claimants negotiated and agreed that these derivative claims would be resolved by either (i) no amounts being due between the parties or (ii) the claimants making a payment to the Debtors. The agreements are reflected in written “Termination Agreements” or similar documents executed by the relevant Debtor and the holder of the Settled Derivative Claim. In order to properly reflect the Debtors’ and claimants’ agreements, the Debtors request that the Court disallow and expunge in their entirety the Settled Derivative Claims listed on Exhibit A.

### **Notice**

12. No trustee has been appointed in these chapter 11 cases. The Debtors have served notice of this One Hundred First Omnibus Objection to Claims on (i) the U.S. Trustee; (ii) the attorneys for the Creditors’ Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) each claimant listed on Exhibit A; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]. The Debtors submit that no other or further notice need be provided.

13. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.



WHEREFORE the Debtors respectfully request entry of an order granting  
the relief requested herein and such other and further relief as is just.

Dated: February 14, 2011  
New York, New York

/s/ Shai Y. Waisman

Shai Y. Waisman

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

# EXHIBIT A

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 101: EXHIBIT A - SETTLED DERIVATIVE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ABERDEEN HIGH GRADE BOND FUND C/O PIONEER INSTITUTIONAL ASSET MANAGEMENT, INC ATTN: MAGGIE BEGLEY 60 STATE STREET BOSTON, MA 02109	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	15326	\$165,610.17*	Settled Derivative Claim
2	ACM GLOBAL CREDIT - U.S. SUB-FUND C/O ALLIANCE BERNSTEIN L.P. ATTN: MICHAEL COFFEE 1345 AVENUE OF THE AMERICAS NEW YORK, NY 10105	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/22/2009	43918	\$1,371,463.00	Settled Derivative Claim
3	ACM GLOBAL CREDIT - U.S. SUB-FUND C/O ALLIANCE BERNSTEIN L.P. ATTN: MICHAEL COFFEE 1345 AVENUE OF THE AMERICAS NEW YORK, NY 10105	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/22/2009	43951	\$1,371,463.00	Settled Derivative Claim
4	ASSOCIATED BANK, NATIONAL ASSOCIATION C/O AMANDA M. GIBBS REINHART BOERNER VAN DEUREN S.C 1000 NORTH WATER STREET SUITE 1700 MILWAUKEE, WI 53202	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	18587	\$77,177.96	Settled Derivative Claim
5	BERYL FINANCE LIMITED SERIES 2007- 19 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANJAY JOBANPUTRA-VP, GLOBAL CORP. TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	10/16/2009	40696	Undetermined	Settled Derivative Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 101: EXHIBIT A - SETTLED DERIVATIVE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6	BERYL FINANCE LIMITED SERIES 2007-19 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANJAY JOBANPUTRA-VP, GLOBAL CORP. TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/16/2009	40697	Undetermined	Settled Derivative Claim
7	BERYL FINANCE LIMITED SERIES 2008-17 C/O BNY CORPORATE TRUST SERVICES LIMITED GLOBAL CORPORATE TRUST SERVICES - DEFAULT GROUP ATTN: SANJAY JOBANPUTRA ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17474	Undetermined	Settled Derivative Claim
8	BERYL FINANCE LIMITED SERIES 2008-17 C/O BNY CORPORATE TRUST SERVICES LIMITED GLOBAL CORPORATE TRUST SERVICES - DEFAULT GROUP ATTN: SANJAY JOBANPUTRA ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17489	Undetermined	Settled Derivative Claim
9	BOARD OF EDUCATION OF THE CITY OF CHICAGO 125 SOUTH CLARK STREET, 13TH FLOOR CHICAGO, IL 60603	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28701	Undetermined	Settled Derivative Claim

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
10	BOARD OF EDUCATION OF THE CITY OF CHICAGO 125 SOUTH CLARK STREET, 13TH FLOOR CHICAGO, IL 60603	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28702	Undetermined	Settled Derivative Claim
11	EBAY INTERNATIONAL AG EBAY INC.; ATTN: TREASURER 2145 HAMILTON AVENUE SAN JOSE, CA 95125	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/23/2008	1470	\$26,972.65	Settled Derivative Claim
12	EBAY INTERNATIONAL AG EBAY INC.; ATTN: TREASURER 2145 HAMILTON AVENUE SAN JOSE, CA 95125	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/23/2008	1471	\$687,652.16	Settled Derivative Claim
13	ESPRIT INTERNATIONAL LIMITED HSBC HOUSE ATTN: THE DIRECTORS 68 WEST BAY ROAD GEORGETOWN, GRAND CAYMAN, KY1-1102 CAYMAN ISLANDS	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	27828	Undetermined	Settled Derivative Claim
14	GULF STREAM - COMPASS CLO 2002-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19155	Undetermined	Settled Derivative Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
15	GULF STREAM - COMPASS CLO 2002-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	19156	Undetermined	Settled Derivative Claim
16	GULF STREAM - COMPASS CLO 2003-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	19153	Undetermined	Settled Derivative Claim
17	GULF STREAM - COMPASS CLO 2003-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19154	Undetermined	Settled Derivative Claim
18	GULF STREAM - COMPASS CLO 2004-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC, ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	19151	\$1,796,711.00*	Settled Derivative Claim

\* - Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
19	GULF STREAM - COMPASS CLO 2004-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19152	\$1,796,711.00*	Settled Derivative Claim
20	GULF STREAM - COMPASS CLO 2005-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC, ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	19149	\$2,411,637.00*	Settled Derivative Claim
21	GULF STREAM - COMPASS CLO 2005-1, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC, ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19150	\$2,411,637.00*	Settled Derivative Claim
22	GULF STREAM - COMPASS CLO 2005-II, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC, ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	19147	Undetermined	Settled Derivative Claim

\* - Indicates claim contains unliquidated and/or undetermined amounts

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23	GULF STREAM - COMPASS CLO 2005-II, LTD. C/O GULF STREAM ASSET MANAGEMENT LLC, ATTN: BARRY K. LOVE THE ROTUNDA BUILDING, SUITE 475 4201 CONGRESS STREET CHARLOTTE, NC 28209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19148	Undetermined	Settled Derivative Claim
24	LUTHER HOME, INC., THE C/O AMANDA M. GIBBS, ESQ. REINHART BOERNER VAN DEUREN S.C. 1000 NORTH WATER STREET, SUITE 1700 MILWAUKEE, WI 53202	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18623	Undetermined	Settled Derivative Claim
25	LUTHERAN HOME, INC., THE C/O AMANDA M. GIBBS, ESQ REINHART BOERNER VAN DEUREN S.C. 1000 NORTH WATER STREET, SUITE 1700 MILWAUKEE, WI 53202	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	18283	Undetermined	Settled Derivative Claim
26	MITSUBISHI CORPORATION ATTN MR KOICHIRO TAKAGI 3-1, MARUNOUCHI 2-CHOME, CHIYODA-KU TOKYO, 100-8086 JAPAN	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	09/21/2009	26239	Undetermined	Settled Derivative Claim
27	NJ HOUSING AND MORTGAGE FINANCE AGENCY ATTN: TODD J. EVANS. DIRECTOR OF CAPITAL MARKETS 637 SOUTH CLINTON AVENUE TRENTON, NJ 08611	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23864	Undetermined	Settled Derivative Claim



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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
28	NJ HOUSING AND MORTGAGE FINANCE AGENCY ATTN: TODD J. EVANS. DIRECTOR OF CAPITAL MARKETS 637 SOUTH CLINTON AVENUE TRENTON, NJ 08611	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23865	Undetermined	Settled Derivative Claim
29	NJ HOUSING AND MORTGAGE FINANCE AGENCY ATTN: TODD J. EVANS. DIRECTOR OF CAPITAL MARKETS 637 SOUTH CLINTON AVENUE TRENTON, NJ 08611	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23866	Undetermined	Settled Derivative Claim
30	OESTERREICHISCHE VOLKSBANKEN- AKTIENGESELLSCHAFT KOLINGASSE 19 VIENNA, 1090 AUSTRIA	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	27285	\$9,722,588.69	Settled Derivative Claim
31	OESTERREICHISCHE VOLKSBANKEN- AKTIENGESELLSCHAFT KOLINGASSE 19 VIENNA, 1090 AUSTRIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27286	\$9,722,588.69	Settled Derivative Claim
32	PAYPAL PRIVATE LTD. EBAY INC; ATTN: TREASURER 2145 HAMILTON AVENUE SAN JOSE, CA 95125	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/23/2008	1467	\$466,864.00	Settled Derivative Claim
33	PAYPAL PRIVATE LTD. EBAY INC; ATTN: TREASURER 2145 HAMILTON AVENUE SAN JOSE, CA 95125	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/23/2008	1468	\$488,983.00	Settled Derivative Claim

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
34	PAYPAL PRIVATE LTD. EBAY INC; ATTN: TREASURER 2145 HAMILTON AVENUE SAN JOSE, CA 95125	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/23/2008	1469	\$393,372.00	Settled Derivative Claim
35	PEARL FINANCE PLC - SERIES 2003-1 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANAJAY JOBANPUTRA - VICE PRESIDENT GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17974	Undetermined	Settled Derivative Claim
36	PEARL FINANCE PLC - SERIES 2003-1 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANAJAY JOBANPUTRA - VICE PRESIDENT GLOBAL CORPORATE TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17975	Undetermined	Settled Derivative Claim
37	SARASOTA COUNTY PUBLIC HOSPITAL DIST. C/O WILLIAM WOELTJEN 1700 SOUTH TAMiami TRAIL SARASOTA, FL 34239	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/17/2009	14812	Undetermined	Settled Derivative Claim
38	SARASOTA COUNTY PUBLIC HOSPITAL DIST. C/O WILLIAM WOELTJEN 1700 SOUTH TAMiami TRAIL SARASOTA, FL 34239	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14813	Undetermined	Settled Derivative Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
39	SIEMENS CAPITAL COMPANY LLC ATTN: JONATHAN FALK, ESQ. 170 WOOD AVENUE SOUTH ISELIN, NJ 08830	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	06/12/2009	4858	\$97,124.97	Settled Derivative Claim
40	SIEMENS CAPITAL COMPANY LLC ATTN: JONATHAN FALK, ESQ. 170 WOOD AVENUE SOUTH ISELIN, NJ 08830	08-13555 (JMP)	Lehman Brothers Holdings Inc.	06/11/2009	4875	\$97,124.97	Settled Derivative Claim
41	SLOVENSKA SPORITELNA A.S. C/O ERSTE GROUP BANK AG ATTN: MAG. JOHANNA BIEGLER GRABEN 21 1010 VIENNA, AUSTRIA	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/16/2009	14199	\$3,482,814.00*	Settled Derivative Claim
42	SPORITELNA, SLOVENSKA GRABEN 21 ATTN: MAG. JOHANNA BIEGLER VIENNA, 1010 AUSTRIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	14235	\$3,482,814.00*	Settled Derivative Claim
43	ST JOSEPHS/CANDLER HEALTH SYSTEM, INC ATTN: VICE PRESIDENT AND CHIEF FINANCIAL OFFICER 5353 REYNOLDS SAVANNAH, GA 31405	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32444	Undetermined	Settled Derivative Claim
44	TEXAS COUNCIL OF COMMUNITY MH MR CENTERS TEXAS COUNCIL OF COMMUNITY MENTAL HEALTH WESTPARK BUILDING 3, SITE. 240- 8140 N. MOPAC EXPY AUSTIN, TX 78759	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/19/2009	19626	Undetermined	Settled Derivative Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 101: EXHIBIT A - SETTLED DERIVATIVE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
45	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: PAMELA WIEDER, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30943	\$32,359.19*	Settled Derivative Claim
46	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: PAMELA WIEDER, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	30945	\$32,359.19*	Settled Derivative Claim
47	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: TIMOTHY PILLAR, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32861	Undetermined	Settled Derivative Claim
48	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: TIMOTHY PILLAR, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32862	Undetermined	Settled Derivative Claim
49	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: PAMELA WIEDER, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32888	\$34,337.49*	Settled Derivative Claim

## IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

## OMNIBUS OBJECTION 101: EXHIBIT A - SETTLED DERIVATIVE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
50	WELLS FARGO BANK, NA AS TRUSTEE OF THE SUPPLEMENTAL INTEREST TRUST FOR STRUCTURED ASSET SECURITIES CORP MORTGAGE PASS- THROUGH CERTIFICATES SERIES 2007- SCI C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	24857	Undetermined	Settled Derivative Claim
51	WELLS FARGO BANK, NATIONAL ASSOCIATION, NOT INDIVIDUALLY BUT SOLELY IN CAPACITY AS TRUSTEE FOR THE SUPPLEMENTAL INTEREST TRUST FOR STRUCTURED ASSET SECURITIES CORP. MORTGAGE PASS-THROUGH CERTS, SERIES 2007- SCI C/O MARY SOHLBERG MAC N9311-161 MINNEAPOLIS, MN 55479	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24765	Undetermined	Settled Derivative Claim
TOTAL						\$40,170,365.13	

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING DEBTORS' ONE HUNDRED FIRST OMNIBUS  
OBJECTION TO CLAIMS (SETTLED DERIVATIVE CLAIMS)**

Upon the one hundred first omnibus objection to claims, dated February 14, 2011 (the "One Hundred First Omnibus Objection to Claims"),<sup>1</sup> of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the Settled Derivative Claims on the grounds that the Debtors and claimants have agreed that the Settled Derivative Claims seek recovery of monies for which the Debtors are not liable, all as more fully described in the One Hundred First Omnibus Objection to Claims; and due and proper notice of the Debtors' Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) each claimant listed on Exhibit A attached to the One Hundred First

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' One Hundred First Omnibus Objection to Claims.

Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the One Hundred First Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the One Hundred First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Settled Derivative Claim listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the Settled Derivative Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the One Hundred First Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine  
all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2011  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE